

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
FEB 24 2020
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

BRYAN ANTHONY REO,

Plaintiff,

v.

MARTIN LINDSTEDT,

Defendant.

Case No. 1:19-CV-02103-SO

Hon. Solomon Oliver, Jr.

Mag. Jonathan D. Greenberg

REO LAW, LLC

Bryan Anthony Reo (#0097470)
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MARTIN LINDSTEDT

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**DEFENDANT'S REPLY BRIEF TO PLAINTIFF BRYAN REO'S
FRIVOLOUS AND UNLAWFUL MOTION FOR SUMMARY JUDGMENT
(Doc 34) with MOTION FOR SUMMARY JUDGMENT AGAINST
PLAINTIFF BRYAN REO**

NOW COMES Pastor Martin Lindstedt ("Plaintiff"), *pro se*, and hereby propounds upon Plaintiff Attorney Bryan Reo Plaintiff this timely filed Reply Brief to Bryan Reo's frivolous and vexatious Motion for Summary Judgment given that Bryan Reo hasn't fulfilled its necessary Fed. R. Civ. Procedure Rule 26 (1)(A)(iii) Initial Disclosures Computation of Damages. Bryan Reo has refused to show how Defendant Pastor Lindstedt or Pastor Lindstedt's Church of Jesus Christ Christian / Aryan Nations of Missouri (henceforth Pastor Lindstedt's Aryan Nations Church) has damaged Bryan Reo for \$500,000 or even fifty cents even when pressed for proof of any real damages in previous federal or Lake County court proceedings. See **Exhibit #1** Defendant's

Rule 26 Initial Disclosures to Plaintiff / Counter-Defendants sent to Bryan Reo, Mrs. Stefani Reo (Mrs. Reo) and Antyhony D. Reo (Bryan Reo's father) and Attorneys Kyle Bristow and Brett Klimkowsky (Bryan Reo's fellow attorneys from the foundation for the MarketPlace of Ideas (FMI) ZOGbot Poverty [F]Law Center. (ZPLC). See **Exhibit #1**, Defendant's Initial Disclosures.

In a previous federal case Bryan Reo's litigation was dismissed, in *Reo v. Lindstedt*, 3:14-cv-05093 in which Pastor Lindstedt said that Bryan Reo was a delusional lying homosexual mongrel of sundry negro, oriental and jewish ancestry working as an agent provocateur since 2002 or 2003 and now back again trying to infiltrate Christian Identity and White Supremacy. Bryan Reo in turn was calling Pastor Lindstedt a "convicted child molester." Pastor Lindstedt joindered around 30-40 of Bryan Reo's fellow ZOGbots including Bryan Reo's father. Bryan Reo would file numerous Motions to Strike and for Summary Judgment. Nothing is new from 2014 or 2015. The Magistrate Judge dismissed Bryan Reo's lawsuit on 10 Sept. 2015 which has exactly the same greviances and complaints of name-calling and mutual hatred. Bryan Reo filed the exact same complaint in Lake County eight days later on 18 Sept, 2015 and due to the corruption of the Lake County Court and a negro and liberal jury Pastor Lindstedt and Lindstedt's Church were 'legally lynched. In that case Bryan Reo yammered about how Pastor Lindstedt didn't answer his requests for admissions even though Bryan Reo refused to make the Rule 26 Initial Disclosures, especially computation of actual damages and Respond to Pastor Lindstedt's Interrogatories and Requests for Admissions with other than lies and evasions. The Magistrate Judge gave Bryan Reo 50 days to show via Rule 26 FRCivP how Reo was damaged and Reo simply could not answer – any more than Reo can and will answer today. So that Magistrate Judge simply dismissed the case brought *in forma pauperis* by Bryan Reo. See

Exhibit #2, ORDER, Doc 48, 09/10/15 *Reo v. Lindstedt* 3:14-cv-05093-MJW. This Ohio federal court should be as wise and mindful of judicial economy and the need to dismiss Reo lawsuits.

Pastor Lindstedt has denied doing any real damage to Bryan Reo or Bryan Reo's wife or father or Bryan Reo's fellow lawyers Kyle Bristow or Brett Klimkowsky pretending to be great White Supremacist "lawfare" attorneys. Bryan Reo keeps on wanting to claim to be an Aryan Christian Israelite over the Internet even though Bryan Reo denied it at Lake County or before this Court. Bryan Reo wants to pretend to be someone out of the hundred thousand homosexual negroes in the Cleveland area and a private figure whom Pastor Lindstedt for whatever vile White Supremacist or Christian Identity / Aryan Nations notions decided to pick upon for no good reason other than because Bryan Reo is suing Pastor Lindstedt (and Lindstedt's Church). As a matter of law, this case should be summarily judged in favor of Pastor Lindstedt because Bryan Reo and Reo's friends and family simply won't let Pastor Lindstedt be, so that Pastor Lindstedt had to give away his inheritance and live a straightened lifestyle of poverty because Pastor Lindstedt has no faith in the Ohio and federal courts to obey the First Amendment.

As this Court admits in its latest ORDER (Doc 35 of 5 Feb. 2020) Pastor Lindstedt has denied all of Bryan Reo's allegations propounded in Bryan Reo's Requests for Admissions. This Court has seen fit to disallow Pastor Lindstedt's Counter-Claims against Bryan Reo's wife and father, Bryan Reo's lawyer friends of the FMI/ZPLC, the crooked Judge Condon and the Lake County Court, the State of Ohio and the U.S. Government for allowing Bryan Reo and its Charlottesville Massacre agents provocateur to be sued. Pastor Lindstedt will of course file a Rule 59(e) Motion for this Court to reconsider its ORDER. Pastor Lindstedt is an admitted White Supremacist and Head of the Aryan Nations of Missouri and racism is His religion. Insofar as disallowing Pastor Lindstedt to represent his Church before this or an Ohio court the proper

place and method of settling religious disputes as to whether Man's regimes or YHWH's Church is supreme is through religious and racial civil warfare akin to the Thirty Years War. Pastor Lindstedt no longer has the funds nor the inclination to borrow currency for an interlocutory appeal of this Court's ORDER, although Pastor Lindstedt might sell stock in Lake County Geldings & Walking Wombs for the applied practice of Biblical castration of Daniel.

Bryan Reo by making an Answer to Defendant Martin Lindstedt's Counter-Claims (Doc 36) against himself, while Reo's Answers are full of lies and evasions, essentially admits that there are genuine material facts for a jury to try. Thus Bryan Reo's Motion for Summary Judgment (Doc 34) is on its very face frivolous precisely because there are ample genuine material facts. Bryan Reo is a federal agent provocateur who likes to call Pastor Lindstedt a child molester (which is untrue and libel per se) and Pastor Lindstedt likes to call Bryan Reo a delusional homosexual mongrel working as an agent provocateur on behalf of the State of Ohio and the federal government and the crooked Lake County Court (and federal court) lets Reo run wild on these malicious lawsuits against racist White Supremacist and Christian Identity leaders.

Bryan Reo in addition to violating Rule 26 governing having to show a computation of damages in initial disclosures, has violated this Court's Local Rule 37.1. – Discovery Disputes. Bryan Reo has not made any effort to contact Pastor Lindstedt regarding his "admissions" but rather filed its Motion for Summary Judgment just like in 2015 and at Lake County while refusing to provide the Rule 26 Initial Disclosures. Bryan Reo is suing over what has been posted on Pastor Lindstedt's Church's web page for years – there is really nothing new to discover from Pastor Lindstedt. In fact, Bryan Reo is suing for a "gag order" permanent injunction contrary to the US Supreme Court rulings since 1931 in *Near v. Minnesota* 283 U.S. 697. This demand for a "gag order" is in fact a demand for the destruction of evidence of Bryan Reo misconduct and

this evidence is genuine material fact. Nor should there be any dispute. If Bryan Reo really wants yet another thread on Pastor Lindstedt's Church's web page summarizing how Bryan Reo is a delusional homosexual mongrel agent provocateur that thinks it is heterosexual Aryan Christian Israelite working for to advance the First Amendment rights of those White Supremacists and Christian Identity figures (other than Pastor Lindstedt and Lindstedt's particular Aryan Nations Church) then that could be arranged without even a telephone conference under L.R. 37.1.


For the fifth or sixth time Pastor Lindstedt denies everything that Bryan Reo wants Pastor Lindstedt to admit other than that Pastor Lindstedt thinks Bryan Reo is a delusional homosexual mongrel working as a ZOGbot, which Pastor Lindstedt admits to for the thousandth or so time.

For a successful Fed.R.Civ.Proc Rule 56 Motion for Summary Judgment to prevail Bryan Reo must conclusively demonstrate that there are no genuine material facts that Pastor Lindstedt can muster in his defense. The facts are that Bryan Reo is a limited-purpose public figure within the White Supremacist and/or Christian Identity Movement, that Bryan Reo isn't remotely White, much less Aryan, that Bryan Reo has nevertheless involved itself in such a Movement's public affairs, that Bryan Reo has admitted to being an informant for the federal government and other matters discussed by Pastor Lindstedt. That if Bryan Reo had left the Movement as it promised when its identity was detected by Pastor around Halloween 2010 and gone on to do whatever it does as a homosexual mongrel and left Pastor Lindstedt in peace then it wouldn't be discussed or commented upon as a result of this frivolous and malicious litigation. Bryan Reo has no real damages because Pastor Lindstedt told the truth about it. However Pastor Lindstedt and Pastor Lindstedt's Church have suffered real monetary damages as a result of Bryan Reo barratry and frivolous litigation as a result of Bryan Reo running amok in the Ohio and federal courts. Wherefore if anyone should gain a Summary Judgment it is Pastor Lindstedt.

Local Rule 7.1 (i) provides for Sanctions for filing frivolous motions. Bryan Reo's Motion for Summary Judgment is a frivolous motion in that there is genuine material fact that Bryan Reo filed this lawsuit in Lake County court along with its wife and father in order to steal Pastor Lindstedt's South Dakota inheritance via these frivolous lawsuits. Bryan Reo has refused to provide the mandated F.R.Civ.P Rule 26 (1)(iii) Initial Disclosures Computation of Damages or to obey Local Rule 37.1 mandating a sincere good faith effort to Defendant to resolve any genuine discovery dispute in which Defendant has already denied that public figure Bryan Reo has suffered any real damages many times over. Rather, Bryan Reo has merely drafted up a harangue and called it yet again a "request for admissions" the like of which has been done before in all the Bryan Reo cases since 2014. Pastor Lindstedt's answers have not changed at all for the past decade. Pastor Lindstedt has no new or different "admissions".

Wherefore, Pastor Lindstedt requests that Bryan Reo's frivolous Motion for Summary Judgment (Doc #34) be denied by this Court, that this Court instead issue a Summary Judgment on behalf of Pastor Lindstedt for the exact same amount frivolously demanded by Bryan Reo against Pastor Lindstedt as a sanction, and that Bryan Reo be disbarred as an officer of this Court for filing along with its wife and father these frivolous lawsuits against an old enemy Pastor Lindstedt for Lindstedt's never-ending work to keep White Supremacy pure Aryan White Christian Israelite and free of delusional homosexual Satanic mongrel abominations & ZOGbots.

Hail Victory !!!


/S/ Pastor Martin Lindstedt
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Pro se Defendant

Dated: Feb. 22d, 2020

Exhibit #1 Defendant's Rule 26 Initial Disclosures, Exhibit #2 Dismissal ORDER of 09/10/15.

CERTIFICATE OF SERVICE

Pastor Lindstedt hereby certifies that he mailed off this Reply Brief / Counter-Claim for Summary Judgment against Plaintiff with exhibits in response to Bryan Reo's Motion for Summary Judgment via US mail, postage prepaid on Saturday, Feb 22, 2020 to:

Attorney Bryan Reo, Stefani Rossi Reo, Anthony D. Reo at 7143 Rippling Brook Lane, P.O. Box 5100, Mentor Ohio 44061.

Even though this Court has outstanding an Order (Doc 35) disallowing Attorneys Kyle Bristow and Brett Klimkowsky to be joindered, Pastor Lindstedt intends to file a Rule 59(e) Motion for this Court to Reconsider / Alter or amend its ruling but scarce funds to actually mail off a copy of this Reply Brief to them and they won't accept service anyways. So an e-mail has been sent off to Attorney Kyle Bristow @ **Bristow Law** <bristowlaw@gmail.com> and to Attorney Brett Klimkowsky @ Brett1066@gmail.com .

This filing is on display on Pastor Lindstedt's Church's forum @
<http://www.whitenationalist.org/forum/showthread.php?2175>

Matt Lindstedt Pastor CTC/ANP